

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LIGHTHOUSE FINANCIAL GROUP,	:	Civil Action No. 1:11-cv-00398-GBD
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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ETHAN GOLD, Individually and on Behalf of	:	Civil Action No. 1:11-cv-01162-NRB
All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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MOTION TO ADMIT COUNSEL, JASON A. FORGE, *PRO HAC VICE*

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Samuel H. Rudman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Jason A. Forge  
Robbins Geller Rudman & Dowd LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101-3301  
Telephone: 619/231-1058  
619/231-7423 (fax)  
E-mail: JForge@rgrdlaw.com

Jason A. Forge is a member in good standing of the Bar of the State of California and there are no pending disciplinary proceedings against Jason A. Forge in any state or federal court.

DATED: January 25, 2012

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN



SAMUEL H. RUDMAN

58 South Service Road, Suite 200  
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Telephone: 631/367-7100  
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Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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AFFIRMATION OF SAMUEL H. RUDMAN IN SUPPORT OF MOTION TO ADMIT  
COUNSEL, JASON A. FORGE, *PRO HAC VICE*

SAMUEL H. RUDMAN, says as follows:

1. I am a member of Robbins Geller Rudman & Dowd LLP, counsel for lead plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiffs' motion to admit Jason A. Forge as counsel *pro hac vice* to represent lead plaintiffs in this matter.

2. I am a member in good standing of the Bar of the State of New York and was admitted to practice law in 1993. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Jason A. Forge is a member of Robbins Geller Rudman & Dowd LLP in San Diego, California.

4. I have found Mr. Forge to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure, as well as the Local Rules of the Southern and Eastern Districts of New York.

5. Accordingly, I am pleased to move for the admission of Jason A. Forge, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Jason A. Forge, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Jason A. Forge, *pro hac vice*, to represent plaintiffs in the above-captioned matter, be granted.

DATED: January 25, 2012

  
SAMUEL H. RUDMAN



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

January 19, 2012

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JASON ADEEB FORGE, #181542 was admitted to the practice of law in this state by the Supreme Court of California on January 17, 1996; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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[PROPOSED] ORDER FOR ADMISSION OF JASON A. FORGE *PRO HAC VICE* ON  
WRITTEN MOTION

Upon the motion of Samuel H. Rudman, attorney for plaintiffs, and said sponsor attorney's affirmation in support,

IT IS HEREBY ORDERED THAT

Jason A. Forge  
Robbins Geller Rudman & Dowd LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101-3301  
Telephone: 619/231-1058  
619/231-7423 (fax)  
E-mail: JForge@rgrdlaw.com

is admitted to practice *pro hac vice* as counsel for plaintiffs in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing ("ECF") system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE GEORGE B. DANIELS  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I, Kelly Stadelmann, hereby certify that on January 25, 2012, I caused a true and correct copy of the annexed documents to be served by U.S. mail to all counsel listed on the attached service list.

  
Kelly Stadelmann



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Service List - 1/23/2012 (11-0069)

Page 1 of 2

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Service List - 1/23/2012 (11-0069)

Page 2 of 2

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